

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROBERT V. TOWNES, IV,	)	
Individually and on behalf of all	)	
Persons similarly situated,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No.: 04-1488-JJF
	)	
TRANS UNION, LLC and	)	
TRUELINK, INC.,	)	
	)	
Defendant,	)	
	)	
STEVEN G. MILLETT and	)	
MELODY J. MILLETT,	)	
Individually and on behalf of all	)	
Persons similarly situated,	)	
	)	
Intervenors	)	

**DECLARATION OF MICHAEL W. BLANTON  
IN SUPPORT OF MOTION FOR LEAVE TO INTERVENE**

Michael W. Blanton, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the Missouri Bar. I have been admitted *pro hac vice* in the action designated Millett v. Truelink, Inc., Case No. 05-599-SLR, District of Delaware ("Millett Action"). I have also been admitted *pro hac vice* in the Townes Action. I serve as counsel for Steven G. Millett and Melody J. Millett ("Intervenors") and the putative class of persons that Intervenors seek to represent in the Millett Action. I submit this declaration in support of Intervenors' Motion for Leave to Intervene.

2. The statements made herein are based upon my personal knowledge and I am competent to testify to the statements set forth herein.
3. Intervenors' counsel have deposed three individuals in Illinois and currently have two additional depositions in California scheduled at the end of June, 2007.
4. Intervenors' counsel have reviewed over 18,000 pages of documents in the process of litigating the Millett Action.
5. Intervenors' counsel have served multiple rounds of discovery on Truelink in the Millett Action.
6. Intervenors' counsel are in the final stages of securing expert witnesses for designation in the Millett Action.
7. Counsel for Intervenors have incurred over \$44,000 in expenses to date in the Millett Action, and anticipate incurring an additional \$17,000, at minimum, for depositions and experts prior to the filing of their motion for certification on August 15, 2007.
8. Discovery in the Millett Action closes on July 15, 2007 and counsel for Intervenors will have completed discovery by that date.
9. Expert reports in the Millett Action are due on July 30, 2007 and counsel for Intervenors will have secured the requisite reports by that date.
10. The motion for class certification in the Millett Action is due on August 15, 2007 and counsel for Intervenors will be filing a motion for certification by that date.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on June 14, 2007, at Kansas City, Missouri.

By: Michael W Blanton  
Michael W. Blanton